

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re: Prehired, LLC

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Joshua Jordan

Appellant,

v.

State of Washington et al,

Appellee.

Civil Action No. 1:24-cv-01181-MN

Bankruptcy Case No. 22-11007-JTD

Bankruptcy BAP No. 24-64

**STATE OF WASHINGTON'S MOTION FOR EXTENSION OF TIME TO APPEAR**

**I. INTRODUCTION**

The State of Washington (the State), by and through Robert W. Ferguson, Attorney General, and Susana Croke, Madeline Davis Rigsby, and Julia Doyle, Assistant Attorneys General, respectfully moves this Court for an order, pursuant to Fed. R. Civ. P. 6(b)(1)(A), extending the time for the State to appear in this matter.

**II. STATEMENT OF FACTS**

On October 22, 2024, Joshua Jordan (Jordan), filed notice of appeal of an Order by Bankruptcy Judge John T. Dorsey denying Jordan's *Motion to Enforce the Final Judgment and Order for Declaratory Judgment, Injunctive Relief, Contempt Sanctions, and for Damages, Legal Fees, and Expenses*. [D.I. 1.]

Counsel for the State are not admitted to practice in Delaware. Counsel for the State appeared in the related bankruptcy case, No. 22-11007-JTD, in accordance with BK LR 9010-1(e)(i), which authorizes attorneys representing state governments to appear by certification.

On October 22, 2024, the Clerk of the Court notified the State of the requirement of association with Delaware counsel within thirty (30) days, in accordance with D.Del. LR 83.5(d) and (e). [D.I. 3.] In this case, the State must appear by November 21, 2024. *See id.*

The State is the process of retaining local counsel to appear in this matter. Declaration of Susana Croke, attached hereto as Exhibit 1, ¶¶ 5–6. To represent the State, outside counsel must be engaged as Special Assistant Attorney General (SAAG) in Washington. *Id.* ¶¶ 3–4. The process of engaging and appointing a SAAG requires several layers of management approval. *Id.* ¶ 4. Counsel for the State has acted diligently by taking steps to identify and engage local counsel but needs additional time to complete the contracting process beyond the current deadline of November 21, 2024. *Id.* ¶¶ 5–8.

Counsel for the State has advised Mr. Jordan of the need for an extension, and Mr. Jordan has informed counsel for the State that he does not object to this extension with the understanding that no further extensions will be requested. *Id.* ¶ 9.

### III. ARGUMENT

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), this Court may, for good cause, extend time if the request is made before the original time or its extension expires.

The State requests an extension of thirty (30) days to appear in this matter so the State can finalize the process of retaining local counsel, and for counsel for the State to seek admission to appear *pro hac vice* in association with local counsel.

A proposed order is attached hereto as Exhibit 2.

#### IV. CONCLUSION

The State respectfully requests that the Court extend the time for the State to appear in this matter, in association with local counsel, for thirty (30) days, by December 23, 2024.

Dated: November 15, 2024

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General

/s/ Susana Croke  
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**CERTIFICATE OF SERVICE**

I, Susana Croke, hereby certify that on this 15th day of November 2024, a copy of the foregoing has been served via regular mail and email to:

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/s/ Susana Croke  
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